

JAP:AHT

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M10- 517**

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18, U.S.C., § 1546)

SHAHID GHAFOR,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

CHARLES HARRISON, being duly sworn, deposes and says that he is a Special Agent with the Department of State ("DOS"), duly appointed according to law and acting as such.

Upon information and belief, on or about May 4, 2010, within the Eastern District of New York, the defendant SHAHID GHAFOR did knowingly and intentionally use and attempt to use a nonimmigrant visa, knowing that said document was procured by means of a false statement and by fraud and was unlawfully obtained.

(Title 18, United States Code, Section 1546(a))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. My information comes from a joint investigation of the DOS and the United States Customs and Border Protection ("CBP") agency.

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<sup>1/</sup> Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

2. On or about May 4, 2010, the defendant SHAHID GHAFOR arrived at J.F.K. International Airport in Queens, New York, on Emirates flight number EK203 from Dubai, UAE. Upon arrival SINGH presented a Pakistani passport, No. AF4188281, issued on May 24, 2006, with a 1964 birth date and a birthplace of Lahore, Pakistan to a CBP officer. The passport contained a B1/B2 visa, Visa Foil No. 58494410 (Control No. 20100211510007), issued by the United States Department of State Bureau of Consular Affairs on February 22, 2010.

3. After presenting his passport, the defendant SHAHID GHAFOR was selected for a secondary inspection by CBP officers.

4. During secondary inspection, the defendant SHAHID GHAFOR told CBP officers that he intended to be in the United States for two weeks to buy engine parts for his business in Pakistan.

5. Upon further questioning, the defendant SHAHID GHAFOR, admitted, in sum and substance, that he paid five lakhs (approximately \$6000) to purchase fraudulent information, including (1) the name of a Pakistani woman whom the defendant falsely claimed in his Visa application was his wife; (2) the contact information for a person in the United States whom the defendant falsely claimed in his Visa application was the business contact that he was coming to the United States to meet;

and (3) the name of a company in Pakistan that the defendant falsely claimed in his Visa application was his employer.

WHEREFORE, your affiant respectfully requests that the defendant SHAHID GHAFOR be dealt with according to law.



CHARLES HARRISON  
Special Agent  
Department of State

Sworn to before me this  
5th day of May, 2010

United States Magistrate Judge  
Eastern District of New York